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January 18, 2019

VIA ECF

Honorable Peggy Kuo  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Ruane v. Bank of America, N.A., et. al.*, 1:17-cv-03704 (PKC) (PK)

Dear Judge Kuo:

We are the attorneys for defendant, Bank of America, N.A., in this action. Enclosed please find a Proposed Discovery Plan, on consent of all parties, extending the discovery deadlines by an additional 120 days so that the parties can complete needed fact discovery. A prior application was made by plaintiff's counsel which had extended the dates by 90 days and the deadline to complete fact discovery is now February 7, 2019. Plaintiff has just filed a second amended complaint on January 11, 2019 as per the court's order. The parties are still exchanging needed discovery and are in the process of trying to schedule depositions as well. We just recently received information from Plaintiff so that we can now submit proposed subpoenas for records to the court for approval. It may take 30 to 60 days before getting the subpoenaed records once approved and served and we then need time to schedule and complete plaintiff's deposition. Due to the complexity of the discovery we respectfully request the additional time and approval of the Proposed Discovery Plan.

Respectfully submitted,

WILSON ELSE MOSKOWITZ  
EDELMA & DICKER LLP

A handwritten signature in black ink, appearing to read 'Aaron Weissberg', with a stylized flourish at the end.

Aaron Weissberg

cc: All counsel of record (via email)